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December 18, 2020

VIA ECF

The Honorable Kiyo Matsumoto
United States District Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Greebel, S1 15 Cr. 637 (E.D.N.Y.) (KAM)

Dear Judge Matsumoto:

We respectfully submit this response to the Court's order dated December 15, 2020 granting Mr. Greebel the opportunity "to identify any potential witnesses that he may wish to call to testify about matters within the narrow scope of the hearing." We intend to potentially call Daniel Hogans of the Groom Law Group, Karl Groskaufmanis of Fried, Frank, Harris, Shriver & Jacobson LLP ("Fried Frank"), and Mark Broutman and Jim Berge of Katten Muchin Rosenman LLP ("Katten"). Subpoenas directing these witnesses to testify are attached as Exhibit A.

Additionally, we respectfully plead with the Court to allow us to serve very narrow documents requests on Fried Frank and Katten. These document requests are attached as Exhibit B.

Respectfully submitted,

/s/ Reed Brodsky

Reed Brodsky

cc: All Counsel of Record (Via ECF)